

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)	
)	
Rules and Regulations Implementing the)	
Telephone Consumer Protection Act of 1991)	CG Docket Number 02-278
)	
Petition for Declaratory Ruling of)	
Life Insurance Direct Marketing)	
Association, et.al.)	

COMMENTS BY JOHN A. SHAW

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Introduction and Summary

These comments are to the Petition for Declaratory Ruling filed by the Life Insurance Direct Marketing Association, et al. (LIDMA)¹, which I oppose.

I comment as a telephone consumer only. I am not involved in the life insurance business.

Reason for opposition

I oppose the LIDMA petition because I feel that telephone consumers are already receiving too many telemarketing calls. If consumers want more information about their policies, they are free to contact the servicing agent. The consumers also have the option of providing their servicing agents with permission to contact them.

LIDMA asserts, in their petition, that “Customers want and expect their servicing agents to keep them abreast of changes”² The evidence that LIDMA provides for this assertion is a statement in a brochure that:

These consumers want more contact with their agent/carrier: 54% of US life customers don’t recall a meaningful contact in the past 18 months, and 46% say they expect and desire more, and more relevant, communications.

That is, a minority of consumers want more communications with their agent/carrier. In footnote 22 of the petition the figure of “46%” is omitted.

I ask that the Commission deny the petition.

Respectfully submitted,

/s/

John A. Shaw

¹ Request of Life Insurance Direct Marketing Association, National Association of Insurance and Financial Advisors, National Association of Independent Life Brokerage Agencies, and Association for Advanced Life Underwriting for Clarification and Declaratory Ruling, CG Docket No. 02-278 (filed June 18, 2018) (Petition).

² Petition at 8, quoting from Wassink, Bernhard, Castagnetta, Avril, Metz, Simon, *Life Insurance Distribution at a Crossroads*, p. 5, exhibit 2 of Petition, available at <https://www.ey.com/Publication/vwLUAssets/ey-life-insurance-distribution-at-a-crossroads/%24FILE/ey-life-insurance-distribution-at-a-crossroads.pdf>.